

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeferle, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

February 5, 2020

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: _____

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Daniels:

On behalf of all plaintiffs with pending claims against Al Rajhi Bank, I write to request a one business day extension of the deadline for plaintiffs' response to Al Rajhi Bank's motion requesting that this Court proceed to decide Al Rajhi Bank's earlier-filed Rule 12(b)(6) motion to dismiss for failure to state a claim, prior to permitting the jurisdictional discovery contemplated by the Second Circuit's mandate. *See* ECF Nos. 5384-5385.

Plaintiffs in the various cases to which the motion applies have agreed to file a consolidated opposition and the Court previously set a February 7, 2020 deadline for that opposition. *See* ECF No. 5696. Based on intervening scheduling issues and other developments, plaintiffs need an additional day to secure the necessary sign-offs from the numerous clients and counsel whose separate interests will be addressed in the consolidated opposition. Accordingly, plaintiffs respectfully request that the Court grant a one business day extension to the deadline for plaintiffs' opposition, from Friday, February 7, 2020, to Monday, February 10, 2020. Plaintiffs would further request that the deadline for Al Rajhi Bank's reply brief be extended from March 4, 2020 to March 9, 2020.

Al Rajhi Bank consents to the relief requested herein.

The Honorable George B. Daniels
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Respectfully submitted,

COZEN O'CONNOR

A handwritten signature in dark ink, appearing to read "Sean P. Carter", is written over the printed name.

By: Sean P. Carter

SPC:pak

cc: The Honorable Sarah Netburn (Via ECF)
All Counsel of Record (Via ECF)

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